

Original

**KING COUNTY INTERNATIONAL AIRPORT
ROUNDTABLE**

**Minority Report
Submitted by Community Representatives
to
King County Executive and King County Council**

**Re:
King County International Airport Master Plan**

May 1998

INTRODUCTION

We, the undersigned, are not in agreement with some of the positions of the majority of the KCIA Roundtable on a number of issues and wish, by submittal of this minority report, to speak to those issues and clarify our positions.

The background of our concerns stem from two distinct perspectives: (1) balance of quality of life in Seattle vs. inappropriate airport growth; and (2) the very real health and safety concerns both at KCIA and in the neighborhoods. The fastest growing neighborhoods are in those around KCIA; West Seattle, Beacon Hill, and the Rainier Valley in Seattle and Tukwila, as well as unincorporated areas of King County and the Kent Valley. These neighborhoods have more developable land available than most others, and are the ones most heavily impacted by the KCIA's operations. As the population density increases, even more people will be impacted by the noise and related health issues. Many of the neighborhoods provide much needed low income housing, not just because of the airport's presence, and have a tremendously valuable ethnic diversity that we must preserve, even when people cannot speak for themselves. It is imperative that these issues be addressed now in this planning process rather than later, and that KCIA realize that it alone cannot meet the increasing demand for airport space, and should allow its constraints to be based as heavily on the needs of its neighbors, as it is on its land use capability.

We also have additional concerns and requests that may not fit into the recommendation itself, but nonetheless need to be addressed at this time as part of the process.

Our three main positions are as follows and will be explained in this document:

1. Declaring a 9200 feet airstrip.
2. Support of King County Council's CTED Committee's motion #9709 to continue a moratorium on any new leases until after the FAR Part 150 and 161 studies have been completed and a final Master Plan has been adopted.
3. Aggressively completing and implementing FAR Part 150 and 161 studies to restrict noisy larger jets and limit nighttime operations.

We would also like to present a community developed Community Alternative, Revision II, as another viable conceptual plan to put before an EIS and take forward as a viable option as a preferred Master Plan. Its main features are a 9200 feet runway, reduction of larger, noisier low-flying jet operations over Seattle neighborhoods, permanent air quality, noise and vibration monitoring, and a noise reduction menu.

THREE POSITIONS

1. Declaring a 9200 feet airstrip.

There are two viable solutions to correcting the Southend Safety Zone violations. One would be to declare the runway to be 9200 feet. The other would be the northern 800 foot extension. The FAA is not requiring the extension or maintenance of the 10,000 feet runway. Of the Airport operators, only Boeing has stated a need (vs. want) of the extension to accommodate 3% of their total operations, which would be approximately .05% of the total operation at KCIA. This hardly appears to justify the cost of \$3-5 million. The FAA has not, to date, stated publicly that this level of need meets their requirements for financial assistance. Would King County be willing to pay the tab for it?

The extension would also bring the larger, heavier jets' vibrations another 800 feet closer to the Georgetown Powerplant Museum, potentially threatening its stability. The Powerplant is one of only two landside National Historic Landmarks in Seattle and must be protected. We have been told that there is a separate EIS that must be conducted when a Landmark is potentially threaten. The FAA, in the November 21, 1997, Master Plan Review Letter is recommending that, if the extension goes forward, the Powerplant would need to be removed.

There also remains the confusion of the consultants' statement that there are buildings north of airport property that would need to be purchased and destroyed when for sale to meet other FAA height limitations in a "protection zone" or "clear zone". These buildings include at least one low-income apartment building, a number of homes, businesses and the Historic Georgetown City Hall building.

2. Support King County Council's CTED Committee's motion # 9709 to continue a moratorium on any new leases until after the FAR Part 150 and 161 studies have been completed and a final Master Plan has been adopted.

Lifting the moratorium on leases will lock in land use and immediately create a de facto Master Plan. This may render meaningless further study of alternatives, further deliberation about the Master Plan, the results of the EIS, and any possibility of implementing the recommendations of the FAR Part 150 and 161 studies.

Although we understand fully UPS's business and growth interests in getting a lease that would prevent them from having to seek other accommodations, lifting the moratorium will also allow them to immediately expand, leaving the citizens of King County concerned with the noise and environmental effects of noisier, bigger jets (air

cargo) powerless to effectuate change. The due process protections of the Master Plan process and EIS process will be undermined by ending the moratorium.

KCIA has provided us with a Schedule (1997) of Operators, their fleets, schedules and approach noise levels measured at approximately 1 mile from the airport (included in the Appendix). Although UPS reminds us that they have upgraded their fleets for noise reduction, their noise levels are equal to and sometimes even greater than other operators' fleets. To add significance to this fact, we note that they have by far the greatest volume of nighttime operations.

3. Aggressively pursue, complete and implement FAR Part 150 and 161 studies to perform noise evaluations and to restrict nighttime and other excessive noise impacts.

It is *not* our intent to limit our focus to one group, such as cargo, nor to single them out, nor is it our intent to close the airport at night, but to actually address all users of the larger, noisier aircraft with the lower, more penetrating and disturbing noise frequency levels Whenever they occur. We understand that there will need to be some exceptions made relative to Boeing's operational needs.

The gravity of the noise levels linked to KCIA operations at night have been well documented by 87% of the noise hotline complaints being nighttime air cargo flights, while these flights comprise only 6% of the total KCIA operations. While air cargo, the major nighttime operators, state that SeaTac can't accommodate their business, it is estimated that KCIA carries only 10% of the cargo volume of SeaTac. SeaTac experiences approximately 6% increase in cargo per year, so it appears that they could absorb the KCIA cargo business within approximately three years.

Although the noise hotline complaints have been predominately related to nighttime noise, we also request that the FAR Part 150 and 161 study daytime noise levels generated by the larger noisier low-flying jets that account for the remainder of the complaints which are also impacting the residents, businesses and employees predominately in Georgetown. Any noise insulation or mitigation measures should also include the business sector.

We would also request an emphasis on single event noise level impacts over the usual annual 'averaged out' noise level models to more accurately convey the impact of these noise assaults.

There are a number of residents in Georgetown that have suspended customary repairs and expenditures, like new roofs, to their homes pending these study results. A reassurance is needed that they won't need to continue fearing being bought out at less than market value in the near future. This policy in the short term may not effect

the character of the neighborhood, but could, over a longer period of time, result in the deterioration of a stable neighborhood.

OTHER CONCERNS

1. The FAA Review comments of November 21, 1997 (document included), requests an evaluation of the "... mixing of small and large aircraft operations as several potentially hazardous situations presently exist on the airport" To date, we do not believe these conditions have been evaluated and remedied to the FAA's satisfaction. The one proposal to shorten 13L/31R by 200 feet has not been determined adequate as it still allows the present conditions of aircraft flying over other taxiing aircraft. We are very concerned about putting forth a consultant's proposal, which has not satisfied a FAA request for evaluation.
2. The screening wall and plantings proposed by the consultants, by their own admission, will not help noise reduction due to its distance from the airplanes themselves.
3. We request that viable noise mitigation measures be proposed for Beacon Hill, Tukwila and West Seattle, in addition to insulation programs which do not aid disturbances experienced while outside.
4. Although the flight path over Magnolia and Queen Anne may/will be shifted over Elliot Bay to achieve noise reduction in those neighborhoods, it increases the potential for noise at Alki. We are not comfortable pitting one neighborhood against another by shifting flight paths that may significantly increase the noise levels in another neighborhood. We believe the only real solution to equitable noise reduction is not to shift its source to other neighborhoods, but to restrict the types of aircraft that cause such high levels of complaints.
5. We would request that the FAA further evaluate and/or require other flight path designations and institute tightly controlled corridors:
 - To raise the KCIA airspace to increase the distance between the low flying planes and homes/businesses.
 - To regulate all flights paths over Seattle to Industrial zones, eliminating free VFR flying over Seattle. For example, using the I-90 corridor for East-West access instead of Beacon Hill and by required use of the East Marginal Way corridor

instead of the Vashon Departure or West Seattle reservoir approach, moving more small aircraft away from homes in the West Seattle neighborhoods; and

- Flights over Georgetown should be required to fly over the railyard instead of flying directly over the home.
6. That King County/KCIA establish broader mitigation and noise reduction measure than the minimum established and paid for by the FAA and commit to providing adequate funds for implementation of those measures.
 7. That King County will familiarize itself with the WAC 173-60-050(d) requiring that engine run-ups be done at remote sites whenever possible, and the FAR Part 161 regulations that permit these restrictions without the need of a full study.
 8. That safeguards be included in the Master Plan to assure that projected levels of growth will not be exceeded by any statistically significant amount. KCIA cannot meet all future demand, and should reduce it's level of expectation of meeting demand based on it's constraints of being in the heart of a city.
 9. That a City of Seattle, City of Tukwila and King County Joint Airport Affairs Committee be commissioned to allow a forum for discussing and resolving joint concerns. The impacts of KCIA affect the residents of these two cities more directly than other King County residents, and we believe that our City governments should be involved in partnering with King County to provide government level policies and direction with respect to the airport's impact on their citizens. Our concerns are often different than those addressed from an operational perspective.
 10. That King County Council reviews the Department of Ecology letter of November 14, 1997 (enclosed), referencing numerous environmental concerns. Although a few of the comments are no longer applicable due to an elimination of all but one of the original alternatives, the vast majority of the document addresses timely concerns of :
 - . . . Since KCIA is located in a highly urbanized diverse area the elements of being a good neighbor need to be more fully described.
 - . . . The Master Plan proposal as having direct, indirect and cumulative impacts of air pollution and traffic sufficient to be considered adverse impacts
 - . . . A cumulative effects analysis, which addresses area-wide community and environmental impacts, needs to be included. King County needs to carefully consider the range of probable impacts including short-term and long-term effects of noise, vibration, air pollution, traffic and contaminated sites
 - . . . The concept document is heavily weighted toward economic considerations. The document must also ensure that environmental values and amenities are given the necessary and appropriate considerations

11. That an exhaustive study of the health effects of KCIA operations on residents and workers in impacted neighborhoods relative to aircraft engine exhaust and unburned fuel analysis be completed and protective measures for the populace be instituted.
12. That the \$200,000 KCIA allocated for an air quality analysis include extensive air quality samples rather than predominately screening modeling studies.
13. Since the airport has a surplus of \$7 million, nearly a year's budget, and approximately 90% of their annual budget comes from leases and fuel flowage, we would assert that the airport could reduce the number of operations without negatively affecting their bottom line. The current landing fees and tonnage fees are well below market values and, if adjusted to that level, could provide additional funds.
14. We note that the current Alternative 4 cargo levels are projected to be 29,400 by 2015, which is 1,600 operations more than Alternative 2-AirCargo Emphasis (27,800) which was ruled out as a non-viable alternative. An increase in the projected numbers of air cargo are not seen as an acceptable scenario.

IN SUMMARY

- One 747 arriving and departing . . . produces as much smog as a car driven over 5,600 miles and as much polluting nitrogen oxides as a car driven nearly 26,500 mile (Flying Off Course, 1996)
- Aircraft emissions fan over twelve miles on approach and a more concentrated six miles at departure. (U.S. Department of Commerce, Environmental Science Services Administration Weather Bureau Technical Memorandum WE-58)

We are committed to maintaining the quality of life we have had the privilege of experiencing, living in Seattle and King County. As we look not just 20 years into the future, but 50 or 75 years, it seems imperative that while at this juncture in the road, we stop and ask ourselves, "Where is the balance between economic vitality and a healthful, soul-sustaining quality of life?" At what point do we stop the unabated "bigger is better" growth phenomenon and look to our future and the environmental, social, and human impacts of our decisions? Bigger isn't better anymore. Our children and children's children need to be able to look back at our choices and not wonder, "What were they thinking?," but know that we made choices that have positively benefited their quality of life.

To this end, we, the communities around KCIA, are recommending another and more fully comprehensive evaluation of the options.

We trust that our governing body of King County will have as much concern for positively shaping our future as we do.

Respectively submitted,

Lynn Tucker, Beacon Hill/Rainier Valley

Charlie Cuniff (DISSENT 04 #1)
CHARLIE CUNIFF

Randy Eatherton
Randy Eatherton Georgetown Crime Prevention and Community Council

Magnolia Community Council
Daniel & Daugherty

The Tukwila City Council does not support the consultants' recommendations for the Land Use plan, meaning no expand acreage for cargo. However, they did support the 10,000 foot runway, the 24 hour access and the ending of the moratorium on leases. Rosemary Unterker, Tukwila

King County International Airport - Boeing Field
FAA Review Comments - Airport Master Plan
November 21, 1997

Cargo vs. GA / Large vs. Small Aircraft

On the east side of the airport the analysis has centered upon land use designations for areas to serve air cargo vs general aviation. Building heights needed to serve the larger air cargo aircraft were considered and appropriate areas were designated. It may also be worthwhile to evaluate the impact of mixing large and small aircraft operations regardless of the aircraft's purpose. Several potentially hazardous situations presently exist on the airport which should be investigated further and corrected if warranted.

Taxiway A-9 and the location of the landing threshold for Runway 13L

Large aircraft (B-757/767) are presently being regularly used for air cargo operations on the east side of the airport. When these aircraft are holding to cross the long runway at Taxiway A-9 their tails stick up as much as 53 feet penetrating the approach surface to Runway 31R. Please insure that the FAA threshold siting requirements are met on both ends of this runway. As smaller aircraft are operate to Runway 31R/13L, they often overfly one or more of the aircraft taxing or holding. Many of the pilots of the smaller aircraft are student pilots and avoiding overflight is at times awkward if not impossible. The tower controller often notifies landing pilots about the large aircraft on the taxiway and advises them to fly the VASI but these operations could become a major issue if the number of large aircraft on the east side are allowed to increase.

Taxiway Weight Restrictions

Another restriction placed on the movement of large aircraft on the east side of the airfield are weight restrictions on certain pavement sections of Taxiway A. These pavement restrictions should be considered when identifying the siting of operation areas for large aircraft.

Approach End Runway 31L

Runway Safety Area/Object Free Area

Runway 31L has a non-standard Runway Safety Area (RSA) due to the existence of a fence and road (Airport Way) which is located just east of the runway. The RSA should extend 250' on each side of the Runway Centerline and extend 1,000' south from the runway end.

However, it appears that the 250' dimension can only be maintained for approximately 200' beyond the runway end. The Runway Object Free Area (OFA), which includes an even larger area, is also penetrated by the fence, road, and an adjacent railroad. There are

The residents of Georgetown bordering the northwest side of the airfield have been actively opposing airport expansion due to noise and air quality impacts. The development of the northwest area as an aircraft operations area may have adverse impacts on property beyond the airport's present boundary. these impacts should be assessed fully prior to any final decisions about the further development of that area. >

Steam Plant - The Steam Plant is an obstruction and should be moved if possible.

Fuel farm in the RPZ

An additional issue surrounds the existence of a Fuel Farm in the Runway Protection Zone (RPZ) at the approach end of Runway 13R. FAA airport design standards specifically prohibits this type of use within this area. we understand that the fuel tanks are below ground. Please address the mitigation of this non-standard land use within the RPZ. >

RPZ - Runway 13L

Rotary wing - Pad 1 appears to be located beneath the approach slope to Runway 13L. This may be a potentially hazardous situation. Our drawings do not indicate its exact location. The tower reports that this situation should be analyzed to insure safety. There have also been discussions about the other rotary wing pads on the east side of the airport. Further study may determine that one or more of the pads should be closed or eliminated. >



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

November 14, 1997

Ms. Cynthia Stewart
King County International Airport
7233 Perimeter Road South
Seattle, Washington 98108

Subject: Review of the "Recommended Development Plan Working Paper and the Development of Alternatives Technical Paper" for the King County International Airport/Boeing Field Masterplan Development.

Dear Ms. Stewart:

Thank you for extending your original comment period and allowing us the opportunity to comment on the "Development of Alternatives Technical Paper". This document describes and analyzes the alternatives to be considered for the King County International Airport/Boeing Field (KCIA) Masterplan Development.

SEPA Process

It is Ecology's understanding that this is a concept document and that King County has not made a Threshold Determination at this time per the State Environmental Policy Act (SEPA). The KCIA should evaluate whether this document qualifies as a proposal under SEPA (WAC 197-11-055 (2)(a)) and one that meets the definition of an action (WAC 197-11-704 (1)(a)). SEPA encourages review at the conceptual stage and early integration with agency activities. SEPA further provides that for public proposals, lead agencies may extend the time limits prescribed in the rules. Therefore, King County has a great deal of flexibility with regard to the preliminary documents needed for an environmental impacts review.

Based upon our review of this document, we see the Masterplan proposal as having direct, indirect, and cumulative impacts of noise, air pollution, and traffic sufficient to be considered significant adverse impacts. These impacts need to be fully analyzed and we would recommend that a formal threshold decision be made at this time. We would further recommend that this document be used as part of a "pre-scoping" process that is integrated into an expanded scoping under SEPA (WAC 197-11-410).

In assessing the significance of an impact, KCIA should not limit consideration of the proposal to only those aspects within the airport boundaries. A cumulative effects analysis, which addresses area wide community and environmental impacts, needs to be included.



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King County needs to carefully consider the range of probable impacts, including short-term and long-term effects of noise, vibration, air pollution, traffic, and contaminated site identification and cleanups. The impacts analysis should include those that currently exist and are likely to arise or exist in the future. This is particularly important with the current use of Boeing Field as both a flight test operations base for new aircraft development and design, and as a delivery base for new aircraft where customer acceptance testing and systems check out operations are conducted.

Mission Goals and Assumptions

The Mission statement and goals correctly identify the need for KCIA to address its impacts to the community. Since KCIA is located in a highly urbanized diverse area the elements of being a "good neighbor" need to be more fully described.

The assumptions used to evaluate the final set of six alternatives would be more comprehensive if an additional one were added. A sixth assumption should include constraints based upon the elements of being a "good neighbor" as identified in the Mission and goals section of the document. We would encourage KCIA to delete the word "maximize" in the last line of Assumption 3. The criteria provided by this assumption as it is currently written limits the range of reasonable alternatives that could be analyzed. We would recommend grouping all of the assumptions together. The third, fourth and fifth assumptions found on page 13 and 14 need to follow the first two assumptions located on page 3.

Alternatives

The concept document is heavily weighted towards economic considerations. The document must also ensure that environmental values and amenities are given the necessary and appropriate consideration. Maximizing airport specific operations in separate alternatives is too narrow a focus. The document could provide for a broader range of reasonable alternatives.

The alternatives currently identified in the document need to be modified to account for the impacts of noise, vibration, air pollution, traffic, contaminated site identification and cleanups, and the cumulative impacts of noise and air pollution on the community.

We would suggest that Alternative 4 be re-titled as "mixed used" as a descriptor of the alternative.

Based upon our review of this concept document, additional information would be helpful in better understanding the effects of future impacts of the Airport's operational forecasts. This would include noise, vibration, source control of hazardous or dangerous waste, and air quality study and evaluation.

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We recommend that KCIA invite affected agencies to be included in a working group as a part of the EIS/Master plan development process.

Contamination/Cleanup Issues

A review of the contamination and cleanup issues in the two documents reviewed resulted in the following comments:

Recommended Development Plan Working Paper

Page A.5, first bullet - There may be some volatile organic compound (VOC) contamination at the Boeing facility that will need to be addressed. This should be considered during any re-development plans in this area.

Development of Alternatives Technical Paper

Page 63, Section 11.4.3, paragraph 1 - See comment on Appendix F, page 2.

Appendix F, page 2, paragraph 1 - The following sites at the Airport have reported contamination to the Department of Ecology:

- Boeing Site Development, Bldg. 3-801, N. Boeing Field
- Boeing Fuel Test Lab, Bldg. 3-333, N. Boeing Field
- King County Airport (Firestone Bldg. Demolition), 9220 E. Marginal Way
- King County Airport, 6518 Ellis Ave. S.
- King County Airport, 7300 E. Marginal Way S.
- North Boeing Field Bldg. 3-354, Ellis Ave. and E. Marginal Way
- Boeing/N. Boeing Field Bldg. 3-840, Ellis Ave. and E. Marginal Way
- Flightcraft/Boeing Field/King County, Bldg. 8201
- North Boeing Field Fire Training Facility, King County Airport
- N. Boeing Field/Main Fuel Farm/3-818, SE of Bldg. 3-818
- Boeing Fuel Test Lab (Bldg 3-333), N. Boeing Field
- American Avionics/Boeing Field, 7031 Perimeter Road South

There may be other contaminated sites that have not reported their contamination to us.

Appendix F, page 2; paragraph 2 - Regarding the assumption that groundwater is contaminated only if the suspected source of contamination was documented to be at, or below, groundwater levels. This is not necessarily the case, in all situations and for all contaminants. Chlorinated solvents are heavier than water, therefore they can migrate, via gravity and low permeability zones, down through the vadose zone and enter the groundwater, even if the source soils are well above the water table. This can also be the case with the heavier PAHs, especially if in product form.

Please add chlorinated solvents to the list of contaminants expected to be encountered. Chlorinated solvents are often found as common contaminants at airports. They are often used as degreasing agents in automotive and aviation maintenance and aircraft manufacturing. Also, please add metals, often co-contaminants of petroleum products that have been in contact with engine and machinery parts. Also, between the Georgetown Steam Plant and the Boeing property line, there could be an exceedence of the Model Toxics Control Act (MTCA) polychlorinated biphenyl (PCB) cleanup standard, as evidenced by an excavation sidewall sample taken in this area. The Georgetown Plant conducted a PCB cleanup, up to the property line of Boeing.

Appendix F, page 3, all alternatives listed - Regardless of whether or not existing contamination will be unearthed during excavation, it is prudent to assess the condition of probable contaminated areas that will not be excavated. This is necessary to see if other remedial measures will be necessary in these areas, for protection of groundwater and surficial soil contact (human health issues). This is the process required under the MTCA to protect human health and the environment.

Appendix F, page 3, paragraph 3 - The above comment applies, and is relevant to, cost estimates.

Appendix F, page 3, paragraph 5 - A good rule of thumb in the remediation industry is to assume that, whatever volume of contaminated soils that you think that you have, double it, and you are probably close to reality. Cost estimates need to be revised based on the addition of the contaminants chlorinated solvents, metals and PCBs.

Appendix F, page 5, paragraph 3 - Again, a contingency cost estimate needs to be established for sites that will require remediation, other than in excavated areas.

Appendix F, page 5, paragraph 5 - Please revise this section based on the addition of other contaminants, which will change the disposal cost estimates.

Appendix F, page 6, item #8 - We know of no way to correlate site characterization costs to cleanup costs.

Appendix F, page 6, item #11 - Please see earlier comment on complete site assessment to determine if a threat to human health and the environment exists, by determining which contaminants are present and if pathways for exposure exist, potential for migration to groundwater, etc. Contaminated soils, adjacent to utility corridor placement and not remediated, could enter those corridors. Utility corridors can act as preferential pathways for the further migration of contaminants.

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Appendix F, Tables 1 through 7 - See comments, page 2.

If you have any questions, please call Gail Colburn with our Toxic Cleanup Program at (425)649-7058.

Air Quality Issues

As addressed in meetings with Ecology and the Puget Sound Air Pollution Control Agency, there needs to be a current baseline air quality assessment made, followed by a determination of the changes to the current situation caused by each alternative. This should be accomplished through a combination of modeling and air quality measurements.

The impacts of the proposed alternatives on air quality from aircraft operations and associated landside activities need to be addressed as part of the preferred alternative selection process. If you have any questions, please call Doug Brown with our Air Program at (425)649-7082.

Water Quality Issues

A review of the water quality issues resulted in the following comments:

De-icing facilities will require dedicated collection and treatment system which will prevent de-icing agents from contaminating stormwater. Discharges of de-icing wastewater into sanitary sewer will need to be permitted by King County's Industrial Waste Division of King County's Department of Natural Resources.

All projects or expansion disturbing five or more acres of soil will require coverage under the General Stormwater Permit for Construction Activity. The threshold of five acres will be lowered to one acre or more effective sometime in 1998, corresponding to the changes in EPA's proposed stormwater regulations which are scheduled to be published November 25, 1997.

If you have any questions on the above, please call Kevin Fitzpatrick with our Water Quality Program at (425)649-7037 or Lisa Zinner, also with our Water Quality Program at (425) 649-7276.

Noise Issues

Noise is a significant environmental issue that needs to be better addressed during the planning and environmental review process. The regulations regarding noise are found in WAC 173-60, Maximum Environmental Noise Levels. We note that the maximum noise, between the hours of 10:00 pm and 7:00 am, is limited to 50dBA at a Class A receptor (residential areas) from a Class C (industrial) source. Limits may be exceeded for short periods as specified.

Ms. Cynthia Stewart

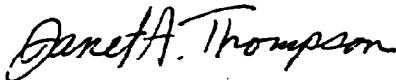
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"Sounds created by aircraft engine testing and maintenance not related to flight operations is exempted from maximum noise levels between the hours of 7:00 am and 10:00 pm, *provided*, that aircraft testing and maintenance shall be conducted at remote sites whenever possible." KCIA is, we know, very much aware that the Airport can not be considered a remote site. The airport, users, and Boeing must comply with the noise regulations during the non-exempted hours. Boeing has their voluntary engine testing curfew hours, but must still comply with the state (and local) regulation on noise limits when they do test. This can be enforced by the airport, King County, or the City of Seattle. Ecology is the enforcer of last resort. The penalty for violations is minuscule (Not to exceed \$100 imposed by local government, RCW 70.107, Noise Control). Chapter 173-60 WAC does not regulate noise associated with aircraft flight operations. We would first recommend that King county/KCIA determine noise levels in the Georgetown and South Park residential areas and assess the level of compliance. Second, we would recommend the develop a community noise abatement plan to ensure no violations and minimize noise levels through discussions with all involved agencies and Boeing.

Once again, thank you for giving us the opportunity to comment. If you have any questions regarding our comments or if I can be assistance in helping navigate through the SEPA process, please call me at (425)649-7128.

Sincerely,



Janet A. Thompson
Senior Environmental Planner

JAT:jat:tm

cc: Gail Colburn, NWRO
Kevin Fitzpatrick, NWRO
Doug Brown, NWRO
Mike Rundlett, NWRO
Representative Velma Veloria
NWRO File

SCHEDULED OPERATORS: THEIR FLEETS & SCHEDULES

OPERATOR	FLEET EQUIPMENT (1)	NOISE LEVELS APPROX / TO (2)	NIGHT-TIME ARRIVAL SCHEDULE	NIGHT-TIME DEPARTURE SCHEDULE
AEROFLIGHT	C-402 PA34T	74.0 / 68.0 72.0 / 64.0	MONDAY-FRIDAY 2130 pm 2230 pm 2300 pm 2400 pm	MONDAY-FRIDAY 0215 am 0345 am 0345 am
AIRBORNE (3) EXPRESS	DC-8 DC-9	88.6-88.8 / 84.1-85.6 89.1-96.0 / 78.6-88.4	MONDAY-FRIDAY 0500 am 0504 am 0554 am	MONDAY-FRIDAY 1930 pm 1950 pm 1950 pm
AIRPAC	PIPER SENECA	N/A	MONDAY-FRIDAY 2400 pm	MONDAY-FRIDAY 0430 am
ALASKA AIRLINES (4)	737-200	85.8-92.1 / 82.4-88.0	MONDAY-FRIDAY 0252 am	MONDAY-FRIDAY 0335 AM
AMERIFLIGHT	LR35 METRO BE-99 BE-1900 CHIEFTAIN	81.6-83.1 / 65.1-71.6 76.0-78.5 / 69.2-71.0 74.0 / 66.0 77.0 / 66.5 N/A	MON 2400 pm TUE - FRI 0415 am 0515 am 0600 am	MON 0015 am 0615 am TUE-FRI 0015 am 0600 am 0630 am
BURLINGTON AIR EXPRESS (5)	DC-8 CONVAIR	88.6-88.8 / 84.1-85.6 N/A	SUN LAYOVER MON LAYOVER TUE 6:14 am WED 6:14 am THU 6:14 am FRI 6:14 am SAT 7:14 am	LAYOVER 18:50 pm 18:50 pm 18:50 pm 18:50 pm 19:37 pm LAYOVER
METHOW AVIATION	B-18	75.0 / 69.6	SUN - THUR 2330	NO SCHEDULED NIGHT DEPARTURES
UPS (3)	757 DC-8 727 747	84.9-90.5 / 67.6-76.1 88.6-88.8 / 84.1-85.6 86.1-96.0 / 82.4-92.6 92.8-97.8 / 94.1-100.5	MON - FRI 0326 am 0431 am 0435 am 0440 am SAT 0207 am 0430 am 0530 am 0603 am	MON - FRI 0510 am 0520 am SAT 0250 am 0420 am 0448 am

NOTES:

- (1) Fleet in use at BFI varies; equipment listed appears to be typical.
- (2) Landing / Takeoff noise in decibels (a-Weighted) as reported in FAA Advisory Circular 36-3f dated 8/10/90.
- (3) Airline - Stage III equipment.
- (4) Airline - Stage II equipment.
- (5) Not yet flying.

SCOURCE: KCIA Administration